

FILED

MAY 14 2020 DB

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

U.S. DISTRICT COURT
MIDDLE DISTRICT OF TN.

SABRINA HOLDER

Plaintiff,

v.

AT&T SERVICES, INC.

Defendant.

Civil Action No. 3:20-cv-00310

District Judge Eli Richardson

JURY TRIAL DEMANDED

COMPLAINT (AMENDED)

Comes Now, Plaintiff, Sabrina Holder filing this "***Compliant (Amended)***" against Defendant AT&T Services, Inc., alleges:

1. This action is filed to enforce the provisions of Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. & 2000e, et seq, also under ("Title VII") Robinson v. Shell Oil Co. 519 U.S. 337 (1997). **Post-Employment (*former employees*)**.

JURISDICTION AND VENUE

2. This Court has jurisdiction of the action 42 U.S.C. 2000e-5(f) and 28 U.S.C. §1345. Venue is proper in this judicial district under 42 U.S.C. 2000e-5(f)(3) and 28 (b) because it is where the events giving rise to the cause of action herein occurred.
3. Defendant AT&T Services, Inc., a private entity incorporated under the laws of Tennessee.
4. The Equal Employment Opportunity Commission (EEOC) received a timely charge (EEOC Charge No. 494-2020-00562) filed on January 2, 2020. This is a Post-Employment claim therefore all administrative remedies for the "Title VII" claim have been exhausted. (Evidence not submitted to the EEOC rep due to another individual present whose company badge did not match)

HISTORY

This civil lawsuit is a continuation of retaliation/harassment by the defendant AT&T Services, Inc., The original lawsuit (3:11-cv-0076) for racial discrimination, harassment/retaliation and wrongful termination was dismissed in "Middle Tn Federal Court", after 3 years of litigation in December 2015, and "DWOP" in the "Court of Appeals", in December 2016, after becoming ill therefore was not able to continue the case.

In the original lawsuit, as part of a motion, I complained to the Magistrate that, "AT&T continues to follow me". They had been illegally surveillance me (in the workplace and outside the workplace using dark tinted cars and trucks following everywhere I go). Ever since the first complaint of race discrimination and a workman compensation claim was filed against AT&T in 2008. I was wrongfully terminated on or about August 2011. I have not been able to maintain consistent employment because of negative job reference, blacklisting etc.

FACTUAL ALLEGATIONS

The defendant AT&T Services, Inc have been in partnership, with G4S Investigations and Mitch Davis of TSCM, Surveillance, in carrying out such malicious acts and behavior against me and my family for the past few years. Their goal is to cause economic harm and damage to my reputation at any means necessary. This behavior is in retaliation for filing and litigating a racial and discrimination lawsuit against AT&T.

The illegal surveillance using young cohorts to carry out malicious attacks stalking me through GPS tracking and wiretapping (phone and car). They follow me from the time I leave my cul-de-sac until I go home, just like in a movie. They start off following, then one car drops off, another picks up the trace while even others drive nearby in GMC cars and trucks many times without no tints to blend in, almost like a perverted act. They park in odd places and side on the of buildings. The cohorts will even use construction green vests and helmets trying while using body cameras to take pictures, walking by in Walmart (**see attach 1-3**) and even speaking, to my mother's house just waiting. They will even have a cohort walk down the street passing in front of my window, watching as they go by (**see attach 4**).

They would also come in the cul-de-sac and just sit then leave. There were 3 young guys that pulled up parked in front of the house, got out, pointed to my home, dressed in red shirts and black pants, showing gang signs and dancing while the other took pictures, then gets back in the car and sit for about 3 minutes then leave. It was all about creating fear. (**see attach 5-6**)

Using some of the drivers, they are infiltrating places I am employed, using a staffing agency etc to carry out acts of defamation, gossip and negative job referencing causing the employer to terminate my job through blacklisting It is my belief the company may be aware.

It was after the civil lawsuit dismissal in December 2015, that I noticed I was continued to be illegally surveillance. I did not believe that I could prove that AT&T was behind it therefore, I had to pretend the

negative behavior didn't exist in order to continue on with my life, protect my health and family. It was my belief that it would soon end because the case was over.

On and about May/June of 2019 that a black challenger blew his horn at me. I ignored it. A week later, a black challenger paused at my bedroom window, then left. A week after that, I noticed it came and paused in front of my house, then left. Being unemployed, I decided to study the behavior in hopes of finding out who was behind it. I noticed from that point forward different color challengers, Camaros and Dodge Charger (**see attach**) following me to my mother's house, Walmart, post office and when I started working, to and from work etc. These particular cars were used to distract and bring attention, therefore trying to induce fear. The other cars used blended in with rest of society's cars, this individual would follow by walking past, may speak wearing body cameras. Others using a particular to locate me.

I started writing down license plates when possible because they were quick driving by.

I filed a police report on November 15, 2019 at the Midtown Precinct stating it was AT&T. I was told a detective would call back; they never did. I was told if I think it was AT&T that it was a civil matter.

On November 18, 2019, I google surveillance companies in Nashville. The first one was TSCM. In speaking with the assistant who answered the phone, I advised that I was being surveillance, she stated she would have Mitch call me back, I assume she would not call back, I ask who should I be contacting regarding my situation, she stated it was Mitch. Still not believing her, I asked who else could I call, she stated, "No ma'am Mitch does them all".

Mitch, calls approximately 10 min. later, I advised of my situation, he stated to come down and talk with him and bring my license plate numbers, (I knew at this point he may be involved because I only told the police not Mitch regarding license plate numbers, 3 days prior). He later told me to call the Dillon Agency because he was not surveillance.

I contact the Dillon Agency and spoke with John, he stated, "that Mitch and Cory King of King and King Agency does work for AT&T and that Mitch use to work for AT&T but now does some work for them. He said they won't tell me".

I Contacted Mitch again, he admitted that he used to work for AT&T and did some work for them.

I immediately noticed these cars license plates changing, some to temporary tags different from regular temporary car tags, out of state etc. Though the tags changed the faces did not, so I studied the facial structures.

On November 18, 2019, I started working for Phillips, through a staffing agency. I was told by the agency that Phillips always interview but was hiring me just off my resume alone. I noticed 3 of these cohorts working for Phillips during my short time. I was puzzled and a little afraid as to how they were working there. I was terminated with very little training on December 30, 2019. I overheard the Director Christine, tell the manager "get her out of here". I didn't know it was me until I got home and saw the email from the agency to not return. (**see attach 7-10**)

(I had this same issue on the job with AIG and Change Healthcare, companies that I respect but the managers behavior showed concern, not training sabotaging work etc. I was terminated as well by both within 2 months of employment)

On January 9th, 2020, I attended the first day of class training with CASA to Volunteer. I immediately noticed 5 of the cohorts in the class (**see attach11-13**). Shocked and afraid, I didn't think I had enough evidence to call the police, so I watched their behavior. It was not until the third class that I got enough courage to video them on my iPhone, they realized what I was doing and 2 did not return. I only communicated with the coordinator on my desktop computer through email. I finished the class as well as they did and yet I was still being followed to and from class by other cohorts.

On or about February 18, 2020, I interviewed with Caterpillar, during the interview, the manager asked if I knew anyone there, I immediately saw two of the cohorts walk by the glass office looking at me. I now believed they were working through an employment agency. I saw two more on the first day of training. at the end of the week, I had left my badge at home, so I went to security for another one and noticed a new older guy who looked very familiar. As he was making my badge, I realized where I had seen him, so I tried to stay calm and patient. I asked if he and others were working for a staffing agency, he said Yes, as he continued talking. He then said he worked for G4S. I didn't hear him, and he repeated. He was talking low and I said what, and he pointed to his hat G4S (**see attach 14**).

That night remembering what the gentlemen stated about Cory King of King and King, I looked them up on Facebook and immediately on his front page was that he was a former G4S Investigator (**see attach 15**).

I googled G4S and realized they were a large Security Firm, that did surveillance even on foot. I looked at the employee reviews on indeed (**see attach 16 and 16b**). One employee stated,

"Normally starting around 4am, driving to anywhere in the country to begin work between 6 and 7 am to set up surveillance on a property before anyone is awake. Generally, film the claimant going about their day to day life while remaining covert. Hardest part of the role was the hours and traveling..in excess of 80 hour weeks and on occasion 2000 miles in a week. Most enjoyable part was obtaining evidence on a fraudulent claimant who clearly had been lying"

I looked up TSCM and read the whole website and realized he talks about how he is able to track IME, SIMS, deleted text etc. and also how he is able to GPS/track cars, when they stop, start etc.

I looked up their employee review which the employee talks about how they install GPS trackers on cars (**see attach 17**)

I then googled G4S and AT&T looking for a connection, this top Security guard on LinkedIn Info. pulled up showing that he works for G4S and AT&T/Uverse (**see attach 18**)

I googled it again and it showed Smart Vue Intelligent Corp, Of four of the Advisors, Former AT&T CEO and CEO of G4S Investigations. (see attach 19)

It also showed them as Teams for the corporation, Former CEO of AT&T and CEO of G4S Investigations (see attach 20).

(Judge Waverly Crenshaw Jr.)

I had saw on the news a couple years ago that Judge Waverly Crenshaw Jr. had become a Judge for the Middle District Federal Court. He was the lawyer in my last civil lawsuit against AT&T.

I believed that once I filed this civil case that he would be placed as sitting judge, so I waited to see if he would "Recuse" himself preventing unethical behaviors due to the oath, he had taken becoming a Federal Judge. (see attach 21)

He did not immediately recuse himself until I mentioned the word "*conflict of interest and was filing additional documents*", in a motion for an extension of time (Document 5 Filed 04/17/20). It was then he immediately recused himself.

This would be another attempt by AT&T to create bias, induce fear in hopes I would either abort this case or he would find ways to thwart the litigation process and dismiss it.

Me and Judge Waverly Crenshaw Jr. and his legal team did not get along. I filed several motions regarding their behavior even against the magistrate because he showed favoritism, the judge agreed and ruled on my behalf.

In his order granting pauper status, he stated, "Plaintiff lists what appear to be state law claims", is a form of "intent". So, I am concerned of his influence behind the scenes.

I am preparing for the Court of Appeals and even the Supreme Court, if necessary.

There were other strange behaviors involving the defendant and the sever of other relationships, including banking, dental etc. which falls under the act of "Tortious Interference".

TITLE VII VIOLATIONS

Title VII, 42 U.S.C. 2000e2(a)

COUNT 1

Retaliation/ Harassment

COUNT 2

Defamation of Character

COUNT 3

Negative Job Reference

COUNT 4

Tortious Inference

COUNT 5

Intrusion of Solitude / Violation of Constitutional Rights to Privacy

COUNT 6

Intentional intrusion of Privacy

COUNT 7

GPS Tracking/ Wiretapping

PRAYER FOR RELIEF

WHEREFORE, the Plaintiff prays that the Court grant the following relief:

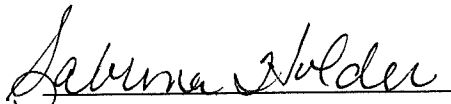
1. Permanent Order of Protection.
2. Intentional and Negligence of Emotional Distress
3. Pain and Suffering
4. Loss of Pay (front and back)
5. Loss of Benefits
6. Punitive Damages
7. Compensatory Damages
8. Summons G4S, Mitch Davis of TSCM and Cory King of King and King Agency
9. Summons Phillip Corporation

JURY DEMAND

The Plaintiff hereby demands a trial by jury of all issues so triable pursuant to Rule 38 of the Federal Rules of Civil Procedure and Section 102 of the Civil Rights Act of 1991, 42 U.S.C. 1981 (a)

Dated: May 14, 2020

Respectfully Submitted

A handwritten signature in cursive script, reading "Sabrina Holder", written over a horizontal line.

Sabrina Holder
Shorecrest Pt.
Nashville, TN. 37189

U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

DISMISSAL AND NOTICE OF RIGHTS

To: **Sabrina Holder**
1709 Shorecrest Pt
Whites Creek, TN 37189

From: **Nashville Area Office**
220 Athens Way
Suite 350
Nashville, TN 37228



On behalf of person(s) aggrieved whose identity is
 CONFIDENTIAL (29 CFR §1601.7(a))

EEOC Charge No.

EEOC Representative

Telephone No.

494-2020-00562

Phillip A. Bornefeld,
Enforcement Supervisor

(615) 736-2108

THE EEOC IS CLOSING ITS FILE ON THIS CHARGE FOR THE FOLLOWING REASON:

- ☐ The facts alleged in the charge fail to state a claim under any of the statutes enforced by the EEOC.
- ☐ Your allegations did not involve a disability as defined by the Americans With Disabilities Act.
- ☐ The Respondent employs less than the required number of employees or is not otherwise covered by the statutes.
- ☐ Your charge was not timely filed with EEOC; in other words, you waited too long after the date(s) of the alleged discrimination to file your charge
- ☒ The EEOC issues the following determination: Based upon its investigation, the EEOC is unable to conclude that the information obtained establishes violations of the statutes. This does not certify that the respondent is in compliance with the statutes. No finding is made as to any other issues that might be construed as having been raised by this charge.
- ☐ The EEOC has adopted the findings of the state or local fair employment practices agency that investigated this charge.
- ☐ Other (briefly state)

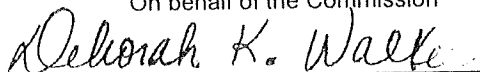
- NOTICE OF SUIT RIGHTS -

(See the additional information attached to this form.)

Title VII, the Americans with Disabilities Act, the Genetic Information Nondiscrimination Act, or the Age Discrimination in Employment Act: This will be the only notice of dismissal and of your right to sue that we will send you. You may file a lawsuit against the respondent(s) under federal law based on this charge in federal or state court. Your lawsuit **must be filed WITHIN 90 DAYS of your receipt of this notice**; or your right to sue based on this charge will be lost. (The time limit for filing suit based on a claim under state law may be different.)

Equal Pay Act (EPA): EPA suits must be filed in federal or state court within 2 years (3 years for willful violations) of the alleged EPA underpayment. This means that **backpay due for any violations that occurred more than 2 years (3 years) before you file suit may not be collectible.**

On behalf of the Commission



JAN 07 2020

Enclosures(s)

Deborah K. Walker,
Area Office Director

(Date Mailed)

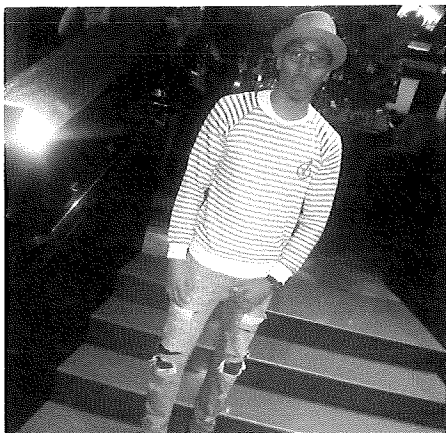
cc:

Laura Given
Employee Relations Manager
AT & T
1057 Lennox Park Blvd. Rm C-210
Atlanta, GA 30319



Attach 1





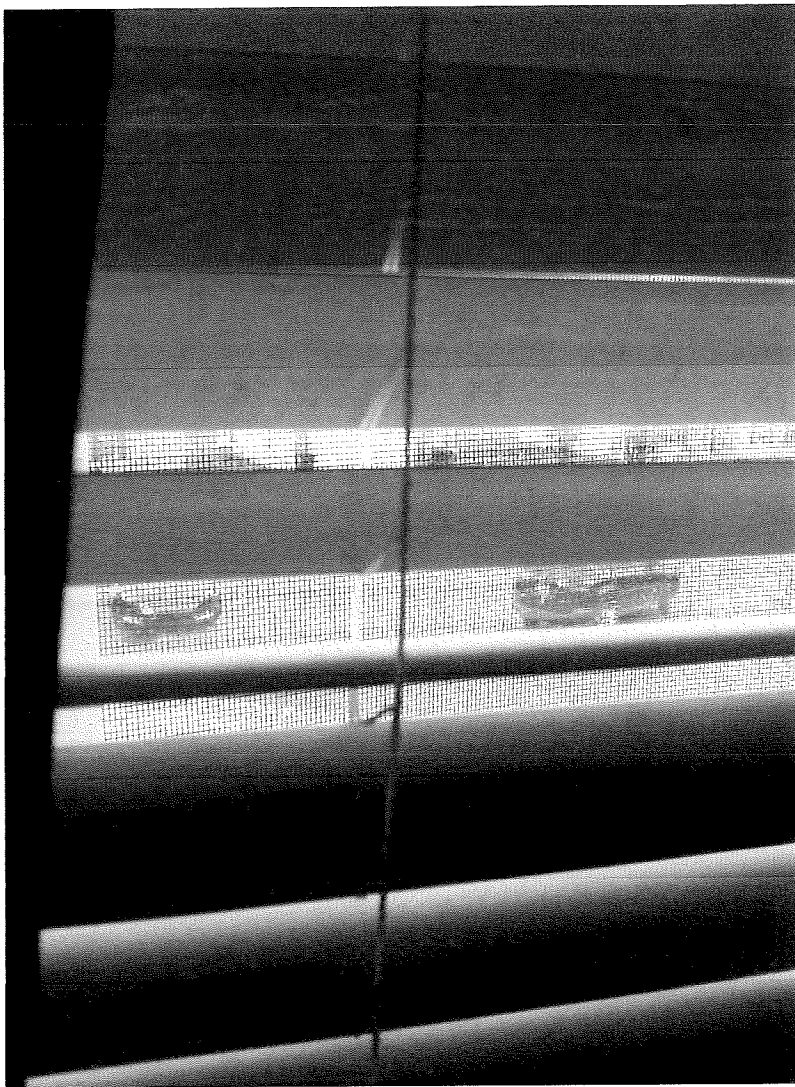
Darin Wylly



Darin Wylly









All ▾



TC

Terrence Chan X



LH



Print



Cancel

assignment

Terrence Chan

<terrence.chan@randstadusa.com>

Mon 12/30/2019 3:40 PM

To: Lafay Holder <Wisdom4smiles2@outlook.com>

hello Sabrina,

Please give me a call when you get a chance.

I needed to speak with you regarding your assignment at philips.

You can call me at 425-482-8860.

Please do not report to work on Dec 31st Tuesday. Thank you.

Kind Regards,**Terrence Chan**

Account Manager

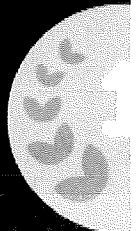
Randstad Corporate Services

Office: 425-482-8860

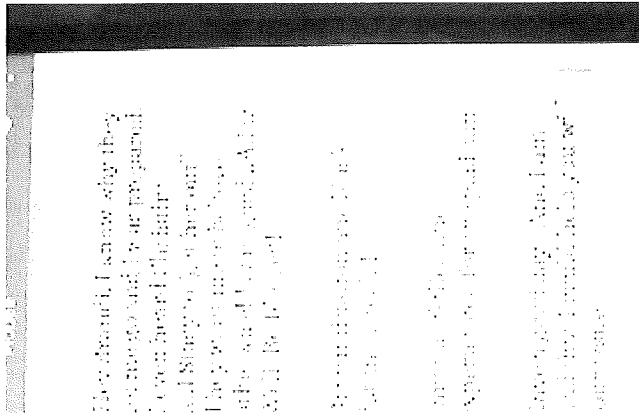
Fax: 503-427-9417

terrence.chan@randstadusa.comwww.randstadstaffing.com

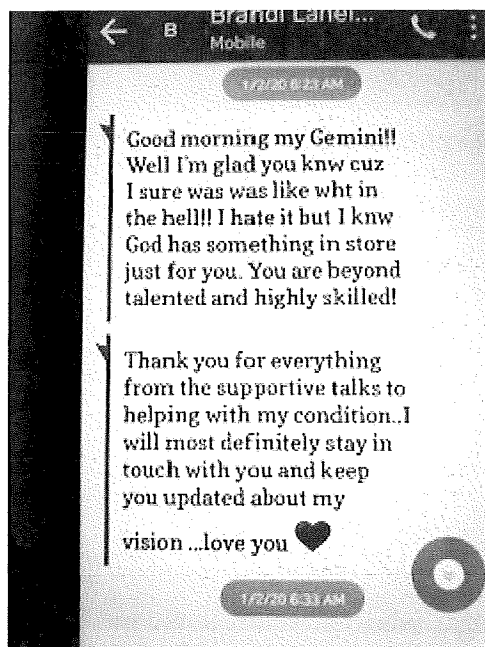
I'm proud to be
part of Randstad

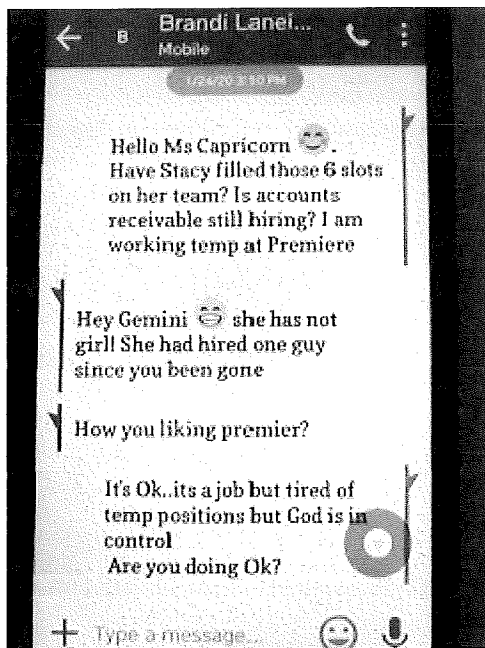


From: Lafay Holder
Sent: Friday, May 15, 2020 7:10 AM
To: wisdom4smiles2@outlook.com
Subject:



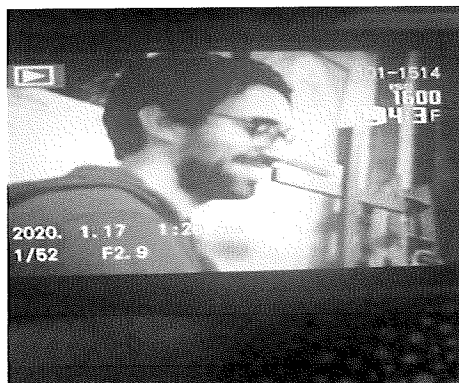
Attach 8







Jesse Rothman



Attach 11



Casey Clark



Lee Adams

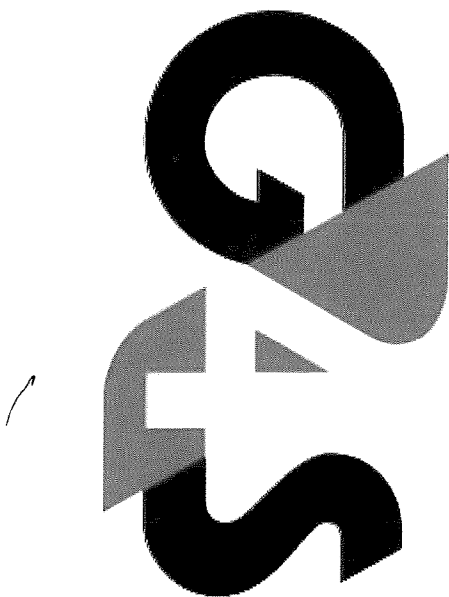


Jonathan Martinez



Black challenger

Darin "live above" Wyly facebook



Corey King



Serina

Home

Find Friends

Create



Corey King

Add Friend

Message

Timeline

About

Friends

Photos

More

DO YOU KNOW COREY?

To see what he shares with friends, send him a friend request.

Add Friend

Intro

Husband, Father, Friend, and Small Business owner.
I am blessed to have so much!

Owner-Operator at King and King Detective
Agency

Former Private Investigator at PhotoFax

Former field investigator at G4S Compliance &
Investigation

Former Collections Manager at Max Touch
Services

Former Loss Prevention Agent at Ford Motor
Credit Company

Studied Detective Training at Detective Training
Institute

Went to Hickman Co Sr High School

Lives in Centerville, Tennessee

From Centerville, Tennessee

Married to Mandy Blocker-King

Pronounces name KOR-ree KING

Manages King and King Detective Agency and
King & King Detective Agency



Corey King updated his profile picture.

April 6 at 5:00 AM ·



Update your profile picture with this frame from Милош
Ивановић.

Try it

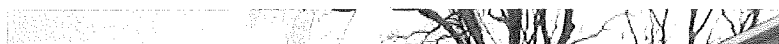
3

Share



Corey King updated his cover photo.

April 6 at 4:59 AM ·





Snapshot

Why Join Us

13.2K
Reviews35.8K
Salaries

Benefits

25
Photos964
Jobs723
Q&A

Interviews

3.0

Learning a great deal

Surveillance Investigator (Current Employee) - Raleigh, NC - May 27, 2013

I am currently employed with the company and learning a deal from Investigators with decades of experience. I am honored to have the opportunity because this type of experience would take years to acquire on my own.

Pros

Great and invaluable experience

Cons

Incredibly demanding work schedule

Was this review helpful?

Yes 12

No 9

4.0

varied and unusual job

surveillance fraud investigator (Former Employee) - Gloucester - January 14, 2013

Normally starting around 4am, driving to anywhere in the country to begin work between 6 and 7 am to set up surveillance on a property before anyone is awake. Generally film the claimant going about their day to day life while remaining covert. Hardest part of the role was the hours and travelling.. in excess of 80 hour weeks and on occasion 2000 miles in a week. Most enjoyable part was obtaining evidence on a fraudulent claimant who clearly had been lying.

Pros

personal use of company vehicle

Cons

very long hours

Was this review helpful?

Yes 6

No

Jobs at G4S

Surveillance Investigator positions

3.0**It's a fair company but needs to take care of its employees better**CPO (Current Employee) - Belleville, NJ - November 24, 2015

They are not completely accurate when they speak about employee benefits. They also need some work on s=communications.

Was this review helpful?

Yes 31

No 4

Report

Share

Jobs at G4S

CPO positions

[See more jobs](#)

Security officer -
Multiple Site - CPO

Milwaukee, WI30+ days ago

Security officer -
Multiple Site - CPO

Madison, WI3 days ago

Armed Security
Officer -
Healthcare Setting

Morganfield, KY11 days ago

Sec >
Mul
Salt

10 d**1.0****Opportunists**

CPO (Former Employee) - Palm Beach County, Florida - September 15, 2015

G4S claims to hire only prior Law Enforcement and/ or Military as "CPO's" Custom Protection Officers, yet they hire and promote young, inexpensived and unqualified individuals to carry weapons, handcuffs and ranks of Sergeants to Majors to supervise their subordinates with egos and disrespectfulness. They are not all unprofessional but the few that are will lie to Management to save face and are quick to put "write ups" in others files as scare tactics.

When higher paying, overtime positions become available, those above said mentioned individuals are the first ones to sign up rather than to pass the emails forward to all employees who make lower wages. Management will return phone call messages unless it is to their advantage.

Pros**Benefits****Cons**

Attach 16 b

Indeed Featured review

The most useful review selected by Indeed

5.0**A great learning experience and interesting place to**na (Former Employee) - Nashville, TN - March 7, 2012

Tscm is a very interesting place to work. Tscm is a private investigation compnay loctated in nashville TN. There you do and learn alot about GPS tracking and placing a GPS tracking device on vehicle. Working there you get to learn about surveillance, phone forensic, researching and tracking people down, and making sure you meet a clients needs and wants.

Was this review helpful?

☒ Yes☐ No[Report](#)[Share](#)**2.0****Empresa complicada**Técnico em Projetos (Former Employee) - Arujá, SP - April 19, 2017

Encontrei muitos problemas durante minha passagem. Muito trabalho, pouquíssimos recursos. Exigiu muito de mim e ainda assim, não houve valorização alguma pela dedicação.

Pros

Vontade

Cons

Desorganizados

Was this review helpful?

☐ Yes☐ No[Report](#)[Share](#)**5.0****Estabilidad laboral**Driver (Current Employee) - Phoenix az - April 14, 2017

Es bastante buena , es muy limpio y además hay un buen ambiente de trabajo y muy buena relación y comunicación con los jefes y compañeros.

Was this review helpful?

☒ Yes☐ No[Report](#)[Share](#)



Connect

Message

More...

Christopher ~~Ritter~~ 3rd

Executive Security Officer at G4S *
Secure Solutions USA / AT&T DIRECTV

Greater Denver Area 187 connections

Contact info

G4S Secure
Solutions USA
Learning Annex
UC Berkeley.

About

Corporate and Clinical / Medical Physical Security and investigations. Security Operations Center. Patient Direct Care, Life Skills in a Clinical environment, Containment Home Specialist. DD client supervision, offender containment, transportation, counseling, support and assistance. Job Developing and Coaching, Medication Administration, MPAP, Certification, Therapeutic Crisis Intervention, Team leadership, Solo Operations. Scheduling, Site Supervision. Security Account Management.

No alt text
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image

securityatt3.jpg

Experience

Executive Security Officer, AT&T / DIRECTV

G4S Secure Solutions USA

Feb 2017 – Present 3 yrs 3 mos

Denver Technological Center (DTC) Denver Colorado

Uniformed Security Officer, Corporate environment.

Lieutenant / Site Supervisor of Physical Security Dept. Training Officer. Security Operations Center, Corporate and (previous)

Attach 1

Advisors

David Dorman
Former Chairman and CEO, AT&T
Former Chairman, Motorola

Frank Marshall
Former Vice President of Engineering Cisco Board
Member PMC Sierra, Juniper Networks

Art Laffer
CEO Laffer Investments, Former Economic Advisor
to President Reagan

Mike Malone
President G4S Investigations, Former Founder &
CEO MJM Investigations

Ed Freeman
Former Vice President of Security Products,
Honeywell



Martin Renkis, Founder & CEO

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Team

Martin Renkis, Founder & CEO
Former Founder & CEO Trainersoft Corporation

Ed Freeman
Former Honeywell VP Security Products

Frank Marshall
Board PMC Sierra, Former Cisco VP Engineering

Mike Malone
President G4S Investigations

Art Laffer
CEO Laffer Investments, Advisor President Reagan

David Dorman
Former CEO AT&T, Chairman Motorola



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3:20-cv-00310 Holder v. AT&T Services, Inc.

✱ Waverly D. Crenshaw, Jr, presiding

Date filed: 04/10/2020**Date of last filing:** 04/13/2020Mobile Query**Query**AliasAssociated CasesAttorneyCase File Location...Case SummaryDocket Report ...FilersHistory/Documents...PartyRelated Transactions...StatusView a Document**Selection Criteria for Query**

Name Criteria	SABRINA HOLDER
Name Matched	Sabrina Holder